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COMMUNICATIONS ENGINEERING AND ECONOMICS

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FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

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November 22, 1996

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Mr. William F. Caton  
Acting Secretary  
Federal Communications Commission  
Washington, D.C. 20544

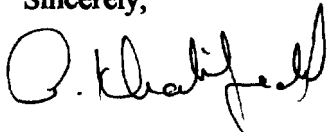
**Re: Petition for Rule Making Seeking to Allot Channel 231A to Mankato,  
Minnesota**

Dear Mr. Caton:

On behalf of Mid-Minnesota Broadcasting Company, please find enclosed an original and four (4) copies of a Petition for Rule Making requesting the Commission to institute a rule making proceeding looking toward the allotment of FM Channel 231A to Mankato, Minnesota. This petition is respectfully directed to the Chief of the Allocations Branch.

Should any questions arise concerning this matter, please contact this office directly.

Sincerely,



Abdolmajid Khalilzadeh

Enclosures

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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

FEDERAL COMMUNICATIONS COMMISSION  
OFFICE OF SECRETARY

In the Matter of )  
 )  
Amendment of Section 73.202(b) ) RM \_\_\_\_\_  
Table of Allotments )  
FM Broadcast Stations )  
(Mankato, Minnesota) )  
  
To: Chief, Allocations Branch

**PETITION FOR RULE MAKING**

Mid-Minnesota Broadcasting Company, by its engineers, pursuant to Section 1.401 of the Commission's Rules, hereby seeks the institution of a rule making proceeding looking toward the allotment of FM Channel 231A to Mankato, Minnesota (population 31,477 persons -- 1990 U.S. Census), as its fourth local transmission service.<sup>1/</sup> Attached is an engineering exhibit prepared by Philip A. Rubin & Associates, Inc. showing full spacings for the proposed allotment. It is proposed that the FM Table of Allotments be amended as follows:

<u>Community</u>	<u>Present</u>	<u>Proposed</u>
Mankato, Minnesota	244C3, 256C1 278C1	244C3, 256C1, 278C1, 231A

<sup>1/</sup> FM Channel 231A may be allotted to Mankato, Minnesota, consistent with all Commission spacing rules at reference coordinates 44° 08' 26" North Latitude, 94° 05' 15" West Longitude.

Mid-Minnesota Broadcasting Company has a present intention to apply for the channel, if allotted, and if authorized, to promptly build a station.

Respectfully submitted,

**MID-MINNESOTA BROADCASTING COMPANY**

By: 

Abdolmajid Khalilzadeh  
Its Engineer

Philip A. Rubin & Associates, Inc.  
1350 Connecticut Avenue, NW  
Suite 610  
Washington, D.C. 20036  
(202) 296-9380

November 22, 1996

**PHILIP A. RUBIN & ASSOCIATES, INC.**

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**WASHINGTON, DC 20036**

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**ENGINEERING STATEMENT**

The firm of Philip A. Rubin & Associates, Inc. ("PAR") has prepared this engineering statement in support of a petition by Mid-Minnesota Broadcasting Company ("Mid-Minnesota") to amend the Commission's FM table of allotment. Specifically, it is proposed that the Commission allocate channel 231A to the community of Mankato, Minnesota.

To confirm the availability of channel 231A in Mankato, a frequency allocation study was conducted for this channel using the minimum distance separation criteria specified in Section 73.207 of the Rules. For the study, the following reference coordinates were used :

Latitude : 44° 08' 26" N

Longitude : 94° 05' 15" W

The results of this study are listed in the attached Exhibit 1. As evident from this exhibit, the proposed reference site would satisfy the minimum separation requirements of Section 73.207 with respect to all existing and proposed FM stations and allocations.

From the above specified reference site, the predicted 3.16 mV/m (city grade) and 1 mV/m contours of a channel 231A station were determined using the methodology described in Section 73.313 of the Rules. It was assumed that the facility operates with an effective radiated power of 6.0 kilowatts at an antenna height of 100 meters above average terrain, i.e. maximum class A operation. The predicted coverage contours are shown in Exhibit 2. The predicted 1 mV/m contour encompasses an area of 2,556 square kilometers and contains a 1990 Census population of 81,685 persons.

**PHILIP A. RUBIN & ASSOCIATES, INC.**

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**ENGINEERING STATEMENT (continued)**

Conclusion

Under the current Commission rules, FM channel 231A may be allocated to the community of Mankato, Minnesota and there exists an area in the vicinity of this community within which a channel 231A, FM station may be located and satisfy the minimum spacing requirements of Section 73.207.

NOV. 22, 1996

Q. Khalilzadeh

Abdolmajid Khalilzadeh

Philip A. Rubin & Associates, Inc.

Exhibit 1

FM Allocation Study

Study Name : Mankato, Minnesota  
 Channel : 231A  
 Study Coordinates : 44 8 26.0 N 94 5 15.0 W  
 Separations : FM Zone 2

Call City / State	File - Number	Channel Status	ERP HAAT	Ant Zone	Latitude Longitude	Dist Bear	Req'd (km)	Clear (km)
KEGEFM Minneapolis, MN	BLH 910814KF	229C LIC	100. 315		45 3 30 93 7 27	127.5 36.4	95.0	32.5
KIAI Mason City, IA	BLH 911024KD	230C1 LIC	100. 241		43 10 4 93 6 5	134.2 143.4	133.0	1.2 CLOSE
WIAL Eau Claire, WI	BLH 810519AE	231C1 LIC	84. 107		44 49 48 91 26 48	223.6 69.0	200.0	23.6
KYRS Atwater, MN	BLH 881208KC	231A LIC	3.00 100		45 4 24 94 45 20	116.4 333.2	115.0	1.4 CLOSE
KDOMFM Windom, MN	BLH 920130KB	232A LIC	5.7 102		43 53 6 95 10 56	92.3 252.4	72.0	20.3
KSTPFM St. Paul, MN	BMLH 910923KF	233C LIC	95. 372		45 3 45 93 8 22	127.1 35.9	95.0	32.1
KNSG Springfield, MN	BLH 950711KD	234C2 LIC	50. 144		44 21 54 95 19 27	101.9 284.6	55.0	46.9
KXAX St. James, MN	BLH 830909AB	285A LIC	3.00 85		44 3 15 94 39 40	46.9 258.4	10.0	36.9

End of Study.

## Exhibit 2

MAP SHOWING THE PREDICTED CITY GRADE (3.16 mV/m) and 1 mV/m CONTOURS OF A THEORETICAL CHANNEL 231A, FM STATION OPERATING AS A MAXIMUM CLASS A FACILITY (ERP : 6.0 kilowatts, HAAT : 100 meters)

PHILIP A. RUBIN & ASSOCIATES, INC.  
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WASHINGTON, DC

